

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ANWAR MOLETTE,

Plaintiff,

v.

RIVER LEE HOLDINGS, LLC and
KIMBERLY MICHELLE PATE,

Defendants.

Civil Action File No.

COMPLAINT

Plaintiff Anwar Molette (“Mr. Molette”) states his complaint against the above-named Defendants as follows.

1. This is a complaint for unpaid wages and overtime compensation in violation of the Fair Labor Standards Act (“FLSA”).
2. This Court has jurisdiction over Mr. Molette’s claims, and venue is proper in this Court.
3. Defendant River Lee Holdings, LLC (“River Lee Holdings”) operates a restaurant known as Puff & Pedals Lounge located at 367 Edgewood Avenue in Atlanta, Georgia.

4. Defendant Kimberly Michelle Pate (“Pate”) owns and operates River Lee Holdings.
5. As the owner of River Lee Holdings, Pate determines and controls the company’s methods of compensating employees of Puff & Pedals Lounge.
6. Within the three-year period preceding the filing of this complaint, River Lee Holdings and Pate (collectively “Defendants”) jointly employed Mr. Molette as a sous chef at Puff & Pedals Lounge.
7. Defendants paid Mr. Molette a flat rate per week, no matter the number of hours he worked.
8. Mr. Molette routinely worked more than 40 hours per week.
9. Defendants did not pay Mr. Molette 1.5 times his regular hourly rate for his working hours over 40 per week.
10. COUNT 1 (unpaid wages) – Defendants violated the FLSA by failing to pay Mr. Molette at least minimum wage for all of his working hours.
11. COUNT 2 (unpaid overtime) – Defendants violated the FLSA by failing to pay Mr. Molette 1.5 times his regular hourly rate for his working hours over 40 per week.
12. Defendants’ violations of the FLSA described above were willful.

Based on the above facts, Mr. Molette requests a jury trial on all triable issues and asks the Court for the following relief: unpaid overtime wages, liquidated damages as permitted by the FLSA, prejudgment interest, litigation costs, attorneys' fees, and other relief deemed appropriate by the Court.

Respectfully submitted on November 27, 2017.

s/ Regan Keebaugh
Regan Keebaugh
Georgia Bar No. 535500

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